

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

DEBORAH FRAME-WILSON, *et al.*, on behalf  
of themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:20-cv-00424-JHC

STIPULATED MOTION AND  
ORDER REGARDING PUBLIC  
FILING OF PLAINTIFFS' MOTION  
FOR AN ORDER REGARDING  
PROTECTIVE ORDER  
STANDARDS APPLICABLE TO  
CLAW BACKS IN PLAINTIFFS'  
CASES

ELIZABETH DE COSTER, *et al.*, on behalf of  
themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:21-cv-00693-JHC

CHRISTOPHER BROWN, *et al.*, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:22-cv-00965-JHC

The Parties have met and conferred with respect to Plaintiffs' Motion for an Order Regarding Protective Order Standards Applicable to Claw Backs in Plaintiffs' Cases, pursuant to the applicable June 3, 2025 Orders Regarding Sealing (*Frame-Wilson* ECF 319; *De Coster* ECF 351; *Brown* ECF 193), and determined that Plaintiffs' and Amazon's briefs, declarations, and exhibits associated with that Motion do not require redactions or sealing. Accordingly, the Parties, pursuant to LCR 7(d)(1) and 10(g), and their respective counsel, hereby stipulate and agree that the docket entries identified in the table below need not remain under seal, and request an order instructing the Docket Clerk to make all of the following docket entries publicly available:

Filing	Date	<i>Frame-Wilson</i> ECF Nos.	<i>De Coster</i> ECF Nos.	<i>Brown</i> ECF Nos.
Plaintiffs' Motion, Beringer Declaration, and Exhibits 1-16	6/3/2025	320; 321 (including exhibits)	352; 353 (including exhibits)	194; 195 (including exhibits)
Amazon's Response Brief, Keeling Declaration, and Exhibits A-B	6/18/2025	328; 329 (including exhibits)	359; 360 (including exhibits)	198; 199 (including exhibits)
Plaintiffs' Reply Brief, Beringer Declaration, and Praecipe	6/24/2025	330; 331; 332	361; 362; 363	200; 201; 202

IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

1 DATED July 7, 2025.

Respectfully submitted,

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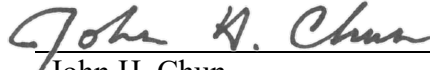
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*Attorneys for Amazon.com, Inc.*

1 IT IS SO ORDERED. The Docket Clerk is directed to make the docket entries identified in the  
2 table above publicly available.

3 July 8, 2025

4 Dated



John H. Chun

United States District Judge